

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>In re:</b>	)	
CAPSTONE PEDIATRICS, PLLC,	)	Case No. 3:19-bk-1971
Debtor.	)	Chapter 11
	)	
	)	
CDS BUSINESS SERVICES, INC. d/b/a )	)	
NEWTEK BUSINESS CREDIT,	)	
Plaintiff,	)	
v.	)	Adv. Proc. No. 3:20-ap-90140
	)	
AMERICA CARES TRUST (ACT) d/b/a )	)	
CARENATION	)	
Defendant.	)	

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**AMENDED MOTION TO WITHDRAW  
AND TO STAY DEADLINE FOR RESPONSE TO  
MOTION TO FILE AMENDED AND SUPPLEMENTAL COMPLAINT**

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Pursuant to Local Rule LBR 2091-1, the undersigned counsel Bone McAllester Norton PLLC, Sam J. McAllester III and William J. Haynes, III respectfully move to withdraw as counsel for America Cares Trust (ACT) d/b/a CareNation.

The undersigned counsel respectfully request that Defendant have thirty (30) days to find new counsel and to answer Plaintiff CDS Business Services, Inc. d/b/a Newtek Business Credit's Motion to File an Amended and Supplemental Complaint (Doc. No. 76), which was filed on August 17, 2021.

Respectfully submitted,

**BONE McALLESTER NORTON PLLC**

By: /s/ Sam J. McAllester III  
/s/ William J. Haynes III  
Sam J. McAllester III #3461  
William J. Haynes III #017398  
Nashville City Center  
511 Union Street, Suite 1000  
Nashville, TN 37219  
(615) 238-6300 (telephone)  
(615) 238-6301 (facsimile)  
[smallester@bonelaw.com](mailto:smallester@bonelaw.com)  
[whaynes@bonelaw.com](mailto:whaynes@bonelaw.com)

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on the following via ECF, this the 20th day of August, 2021.

Daniel H. Puryear, Esq.  
M. Andrew Pippenger, Esq.  
Puryear Law Group Pllc  
104 Woodmont Blvd., Suite 201  
Nashville, Tn 37205  
Dpuryear@Puryearlawgroup.Com  
*Counsel For Plaintiff Cds Business Services, Inc. D/B/A Newtek Business Credit*

David W. Houston IV, Esq.  
Emily Campbell Taube, Esq.  
Burr & Forman LLP  
222 Second Avenue South  
Suite 2000  
Nashville, TN 37201

Michael Gigandet, Esq.  
Law Office of Michael Gigandet  
208 Centre St  
Pleasant View, TN 37146

Natalie M. Cox, Esq.  
Megan Reed Seliber, Esq.  
US Dept of Justice  
Office of the US Trustee

{02281265.3 }

701 Broadway, Ste 318  
Nashville, TN 37203

/s/ William J. Haynes III

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